

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA

v.

EDWARD M. BURKE,  
PETER J. ANDREWS, AND  
CHARLES CUI

Case No. 19-CR-322

Hon. Robert M. Dow, Jr.

United States District Court Judge

**DEFENDANT CHARLES CUI'S UNOPPOSED MOTION  
TO MODIFY TRAVEL RESTRICTIONS**

Defendant Charles Cui, by and through his undersigned counsel, respectfully moves this Honorable Court to enter an agreed order modifying the conditions of his release to allow him to: (1) travel outside the Northern District of Illinois to the state of North Carolina from July 29, 2019 through August 4, 2019; and (2) travel to the Western District of Michigan without date limitation for the purpose of visiting and staying at his second residence located in the Western District of Michigan. In support of this motion, Mr. Cui states as follows:

1. On April 18, 2019, Mr. Cui was arraigned and entered a plea of not guilty. Bond was set at \$10,000.00 own recognizance, and Mr. Cui's travel was restricted to the Northern District of Illinois.

2. Mr. Cui is seeking the Court's permission to travel with his family to North Carolina. The family plans to leave on July 29, 2019 and return on August 4, 2019.

3. In addition, Mr. Cui is seeking the Court's permission to travel without date restriction to his second home in Benton Harbor, Michigan, which is located in the Western District of Michigan. Mr. Cui visits that home on occasion with his family.

4. The undersigned contacted Pretrial Services regarding the present motion. Pretrial Services informed counsel that Mr. Cui is not under Pretrial's supervision and that Pretrial takes no position regarding expanding Mr. Cui's travel beyond the NDIL.

5. The undersigned also conferred with the Assistant United States Attorneys handling this matter. The Government has indicated it has no objection to the relief sought in this motion.

6. Consistent with the Court's standing order, Mr. Cui is contemporaneously submitting a proposed agreed order in electronic format to "Proposed\_Order\_Dow@ilnd.uscourts.gov" for the Court's consideration.

WHEREFORE, Defendant Charles Cui respectfully requests that the Court enter an Order modifying the conditions of his release to allow him to: (1) travel outside the Northern District of Illinois to the state of North Carolina from July 29, 2019 through August 4, 2019; and (2) travel to the Western District of Michigan without date limitation for the purpose of visiting and staying at his second residence located in the Western District of Michigan.

Dated: July 16, 2019

Respectfully submitted,

By: /s/ Tinos Diamantatos

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**CERTIFICATE OF SERVICE**

I, Alex D. Berger, an attorney, hereby certify that a copy of the foregoing DEFENDANT CHARLES CUI'S UNOPPOSED MOTION TO MODIFY TRAVEL RESTRICTIONS was filed on July 16, 2019 using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Alex David Berger  
Alex D. Berger